

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

V.

NO. 4:11-CR-151-A(01)

CRYSTAL MASON-HOBBS

**UNOPPOSED MOTION FOR LEAVE TO OBTAIN, AND REVIEW DOCUMENTS
FILED UNDER SEAL / NOT AVAILABLE TO THE PUBLIC THROUGH PACER
AND/OR TO REDISCLOSE THE PRESENTENCE REPORT**

NOW COMES, Defendant, CRYSTAL MASON, through undersigned counsel, respectfully requests leave of this Court to obtain and review a copy of documents filed under seal / not available to the public through PACER.

Further, Defendant Crystal Mason, through undersigned counsel, requests leave of this Court to provide a copy of the Presentence Report and any addenda to counsel below for the purpose of forwarding Defendant's clemency submission.

In support thereof, counsel states the following:

1. Defendant has authorized undersigned counsel to obtain and review the file in the above-captioned case in connection with counsel's evaluation of Defendant's eligibility to seek executive clemency and the possible preparation of a clemency petition on Defendant's behalf. In order to properly assess whether Defendant qualifies for clemency, counsel seeks access to the following documents (including those under seal and those not otherwise available to the public):
 - a. All case documents
 - b. Presentencing Report
2. Defendant does not have copies of the needed material.
3. Counsel authorized by the U.S. Attorney's Office has represented that the government does not oppose the requested relief.
4. This motion is made in good faith. Review of the requested material is necessary to determine whether Defendant meets the criteria for clemency announced by the Department of Justice.
5. Counsel will abide by this Court's rules governing confidential and sealed documents.

6. When a clemency submission is filed on Defendant's behalf, the Office of the Pardon Attorney requires that the Defendant include a copy of the Presentence Report as part of the submission. *See* OPA Checklist (attached). Defendant has requested that her clemency submission, including a copy of the Presentence Report, be forwarded to the Office of the Pardon Attorney by undersigned Counsel below.
7. Wherefore, undersigned counsel, on behalf of Defendant Crystal Mason, hereby moves this Court for an order authorizing counsel to obtain and review a copy of the aforementioned documents and authorizing counsel/Defendant to provide the Presentence Report to the Office of the Pardon Attorney should a clemency submission be filed, for the purpose of forwarding the submission to the Office of the Pardon Attorney.

Respectfully submitted,

/s/ Kim T. Cole
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that on September 29, 2021, I contacted U. S. Attorney, Alex Lewis via email and he is unopposed.

/s/ Kim T. Cole
KIM T. COLE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 29, 2021 the foregoing motion was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all parties who have entered an appearance in this matter.

/s/ Kim T. Cole
KIM T. COLE